

Delta Regional Report Worksheet

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Please review the Delta Regional Report and provide your comments. The following items would be especially helpful:

- Recent projects and accomplishments, especially for underserved/DAC communities
- Corrections, missing information or additions/subtractions/changes

In either case, it is most helpful to **provide language** for the author (or the correct data) and indicate the source where the information can be found. Please provide the page number(s) and line number(s) to identify the topic you are commenting on.

*** You can also email your comments to: cwpcom@water.ca.gov ***

Comments are due by Thursday, October 10, 2013

Delta Regional Report	
1	<p>Topic: Current State of the Region</p> <p>Page & line number: D-1, 15-16</p> <p>Comment, suggested text: Subject/verb agreement problems here. Maybe use slash - Delta/Suisun March – to agree with It and its ???</p>
2	<p>Topic: Water Governance</p> <p>Page & line number: D-2, line 25 and preceding</p> <p>Comment, suggested text: Create a heading for CALFED (referenced on D-10) and another heading for Delta Vision. Let's not pretend that CALFED didn't exist just because its activities have been supplanted by other processes.</p> <p>CALFED</p> <p><i>In the 1990s, 25 state and federal agencies came together with the mission of improving California's water supply and the ecological health of the San Francisco Bay/Sacramento-San Joaquin River Delta. The Delta's importance to the economic stability of California and the nation led to the drafting in 2000 of a 30-year plan for its management and restoration. Implementation of the plan was ultimately pledged by 25 state and federal agencies with expertise to manage the complex program. This plan, set forth in a programmatic Record of Decision (ROD), laid out a science-based planning process through which the participating agencies were able to make and implement better, more informed decisions and actions on future projects and programs. Two years later, the California Bay-Delta Authority was created to oversee the program's implementation and Congress adopted the plan in 2004.</i></p> <p><i>(So what happened? Was this 30-year plan with a program adopted by Congress simply abandoned? The ROD apparently still has relevance in Suisun Marsh. Didn't the CALFED Independent Science Program become part of the Stewardship Council's science program? The CALFED website just says that everything is archived. It shouldn't take more than a paragraph for someone with knowledge of the CALFED process to provide some continuity here.)</i></p>

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Source: <http://calwater.ca.gov/calfed/about/> However, this site doesn't provide good continuity.

Topic: Delta Protection Commission

Page & line number: D-3, 20

Comment, suggested text: ***The Delta Protection Commission, originally established by the Delta Protection Act of 1992 and reshaped by the 2009 legislation, is responsible . . .***

Topic: Levee System

Page & line number: D-4, 42

Comment, suggested text: ***non-project levees that are (not "need to be") maintained and enhanced primarily by the state and the local reclamation districts.***

This parallels the verbs used in the rest of the sentence and respects the role of local reclamation districts in maintaining Delta levees.

Topic: Land Use

Page & line number: D-6, 4

Comment, suggested text: Delete the first sentence on line 4. In describing the Delta in the preceding pages, the report makes it clear that this is a distinct region. It just isn't a discrete political entity.

Topic: Subsidence

Page & line number: D-9

Comment, suggested text: Please double check these reported rates of subsidence, as Melinda Terry of North Delta Water Agency requested. Also, please note that

There has been some success in managing subsidence by creating ponds and planting them with tules, which were supplemented by cattails and other marsh vegetation, causing organic material to accumulate. This process has the potential to provide economic benefits through carbon sequestration. The Economic Sustainability Plan also mentions the potential use of subsidence-reversal agriculture in the Delta.

Source: <http://www.escholarship.org/uc/item/9pp3n639#page-4>

<http://www.caprado.org/articles/2013/07/02/carbon-farming-in-the-delta/>

Economic Sustainability Plan, page 126

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7

Topic: Unique Challenges/Drivers of Change

Page & line number: D-11, 1

Comment, suggested text: The ecosystem is not in peril solely because of activities within the Delta.

. . . provide water for agriculture and communities ***both within the Delta and, through export, in other regions of California***; discharges

8

Topic: Unique Challenges/Drivers of Change

Page & line number: D-11, 20

Comment, suggested text: Water supply reliability is an issue primarily outside the Delta.

such as the need for ***export*** water supply reliability

9

Topic: Habitat Degradation and Loss

Page & line number: D-11, 37

Comment, suggested text: different mix of species ***than*** the historical Delta

10

Topic: Need for Water Supply Reliability

Page & line number: D-12, 33

Comment, suggested text: The higher level heading here (although it is hard to see this without looking at the Table of Contents) is “Unique Challenges/Drivers of Change.” Supply reliability is a problem for export users. Balancing export expectations with in-Delta requirements is indeed a challenge, but it is not necessary to assume a NEED for greater reliability. Suggested heading:

Water Supply Reliability for Export Users or simply ***Water Supply Reliability*** (which would parallel Impaired Water Quality)

11

Topic: Water Supply Reliability

Page & line number: D-13, 9-11, 12-35

Comment, suggested text: An entire section of this report is devoted to the Bay Delta Conservation Plan. The section on page D-13 should not be used to justify BDCP assumptions.

There are still many unanswered questions about the extent to which habitat restoration as proposed will benefit pelagic organisms. The integrity of Delta levees has been called into question by BDCP planners, but the Economic Sustainability Plan found that they can be fortified for a fraction of the cost of the twin tunnels; they will have to be fortified anyway to protect all the infrastructure in the Delta. Under the third bullet, the third and fourth sentences say, essentially, nothing; what is a “fully inclusive strategy”? How will an implementation strategy be agreed upon, and by whom? If BDCP requires an *apologia*, it should appear with the other BDCP material on page 34ff, not in a section describing objective conditions in the

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Delta.

12

I suggest deleting lines 12-35. In this section, after the sentence on line 8, stick with what is indisputable:

Measures to ensure long-term water supply reliability will need to consider many challenges, including the health of the Delta ecosystem, levee maintenance policies, protection of infrastructure in the Delta that is of statewide importance, and water quality for all users. (See section on the Bay Delta Conservation Plan.)

13

Topic: Flood Risk

Page & line number: D-13, 38-40

Comment, suggested text:

Many of the Delta's levees were initially constructed more than a century ago using primitive materials and equipment and without the benefit of today's engineering standards, ***although many miles of levees have since been improved to modern standards. (See section below on Flood Management.)***

14

Topic: Flood Risk

Page & line number: D-14, 6-9

Comment, suggested text: "Major floods occur regularly in the Sacramento-San Joaquin Delta Area. . . . Floods during winter storms . . . have been a common cause of levee failures in the Delta." Define "flood." Define "regularly." Define "Area." This paragraph is a major misrepresentation of the situation in the Delta.

DWR's own *Sacramento-San Joaquin Delta Overview* (page 34) shows that flooding has declined since the 1980s, with only two major events since 1986.

Suggested text: ". . . and impacts of development. Some urban and small-stream flooding occurs in every large storm, and flows of the Sacramento River at Rio Vista during winter and early spring are often 30 times the typical late-summer flows. In any season, a combination of high tides, high winds, and high water can increase the risk of flooding. High water in the Delta can overtop levees, . . ."

Source: *Sacramento-San Joaquin Delta Overview*, DWR, no date (produced under Schwarzenegger administration, Lester Snow DWR director)

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15	<p>Topic: Projections and Impacts Page & line number: D-15, 6 Comment, suggested text: Misspelling of “state”</p>
16	<p>Topic: Projections and Impacts Page & line number: D-15, 32-34 Comment, suggested text: See comment above regarding frequency of flooding. The risk of levee failure is a function not just of the stress placed on levees under different climate conditions but of proactive efforts to strengthen levees.</p> <p><i>Larger storm events in the Delta will put additional stress on the levees and may increase the risk of levee failures.</i></p>
17	<p>Topic: Projections and Impacts Page & line number: D-16, 12 Comment, suggested text: This section needs to consider the impact of climate change in the Delta within the context of climate change statewide. The State’s own climate projections suggest that the southern San Joaquin Valley will become increasingly inhospitable to irrigated agriculture.</p> <p>Suggested text: In some instances, a longer growing season will be beneficial, but productivity of some crops may decline. <i>However, as warmer conditions south of the Delta become less favorable for agriculture, prime farmland in the Delta will become an increasingly important agricultural resource.</i></p> <p>Source: See climate change maps included in attached article by Deirdre Des Jardins of California Research Associates. The maps are from the States 2009 Climate Adaptation Strategy http://theyodeler.org/?s=Deirdre+des+jardins</p>
18	<p>Topic: Regional Resource Management Conditions Page & line number: D-16, 29 Comment, suggested text: After the reference to D-1641, include a note about where in the report this Decision is explained (now on page D-23), or explain here what it is intended to accomplish.</p>
19	<p>Topic: Ecosystem Restoration Page & line number: D-16, 38 ff Comment, suggested text: Do not include the Bay Delta Conservation Plan in this section. It has not been approved for permitting and its claims for ecosystem restoration remain speculative. BDCP is adequately covered in the Resource Planning section.</p> <p>This section describes the major plans and programs <i>currently in place that are</i> related to</p>

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ecosystem restoration in the Delta and Suisun Marsh.

20

Topic: Ecosystem Restoration Program

Page & line number: D-17, 2, 5

Comment, suggested text: Include **(ERP)** in parens after the name, since the initials are used in the following paragraph. DFG here and elsewhere should be DFW.

21

Topic: Fish Restoration Program Agreement

Page & line number: D-17, 18, 22

Comment, suggested text: Department of Fish and Wildlife, DFW

Line 25: . . . and Yolo Bypass. It is focused. . . . (Hard to read as currently written.)

22

Topic: Bay Delta Conservation Plan

Page & line number: D-17, 29-38

Comment, suggested text: Delete from this section.

23

Topic: Local Habitat Conservation Plans and Natural Community Conservation Plans

Page & line number: D-18, 7

Comment, suggested text: Delete reference to BDCP. The topic here is “locally sponsored” HCPs and NCCPs.

24

Topic: Water Supplies

Page & line number: D-18, 26

Comment, suggested text: “Freshwater flows in the Delta are typically much less than those caused by tides.” **What does this mean?**

25

Topic: Water Supplies

Page & line number: D-19, 11

Comment, suggested text: Groundwater in eastern San Joaquin County (as in other areas) has been used to replace surface water transferred out of the area for use elsewhere; much of the Mokelumne River’s flows are diverted to the East Bay, causing San Joaquin County farmers to turn to groundwater to irrigate their crops.

Groundwater levels in most basins have declined as a result of agricultural and urban

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development *and in some cases as a result of the use of groundwater to compensate for transfer of surface waters to other regions.*

Topic: Water Balance

Page & line number: D-19, 22, 25

26 Comment, suggested text: The statement that “Water export quantities are in a relatively narrow range” is not meaningful because we don’t know what “relatively” refers to. Relative to precipitation, exports are almost 4 times precipitation in a wet year, over 6 times precipitation in an average year, and close to 7 times precipitation in a dry year – not a narrow range of variability. Exports are about 1/6 of Sacramento River inflows in a wet year, almost 1/3 in an average year, and about ½ in a dry year – not a narrow range of variability relative to inflows. I suggest deleting this bullet and incorporating the point to be made here into the last bullet:

Water diversions and exports ***vary much less than outflows but*** are a larger portion of the Delta inflow during a dry year.

Topic: Contract Rights

Page & line number: D-20, 19, 22

27 Comment, suggested text: Add “the Bureau of” before “Reclamation.”
No apostrophe after “contractors” on line 22.

Topic: Water Uses/Inside the Delta/Surface Water

Page & line number: D-21, 18-20

28 Comment, suggested text: “In-Delta residential water is generally drawn through private wells . . .” This is groundwater and should be listed under that heading. In-Delta apparently means Primary Zone. The Contra Costa Water District service area map shows only a tiny fraction of the Primary Zone. The point is that many people living in the Delta rely on private wells; that is, groundwater.

Source: <http://www.ccwater.com/welcome/servicemap.asp>

Topic: Water Uses/Inside the Delta/Groundwater

Page & line number: D-21, 33 ff

29 Comment, suggested text:

Within the Delta’s Primary Zone, residential water is generally drawn through private wells. Little is known about groundwater use from the basins within the Delta’s Secondary Zone . . .

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30

Topic: Outside the Delta

Page & line number: D-22, 11

Comment, suggested text: It is easy to overlook the fact that much of the water diverted from the Delta watershed goes to the Bay Area.

On average, approximately 31 percent of the flow from the Delta watershed is diverted before it ever reaches the Delta, ***including major water supplies for the San Francisco Bay Area via the Mokelumne and Hetch Hetchy aqueducts.***

31

Topic: Outside the Delta

Page & line number: D-22, 16-19

Comment, suggested text: Need to mention oversubscription of water in the Delta watershed.

The SWP has contracts to deliver 4.2 million acre-feet annually. The CVP has contracts to deliver 3.1 million acre-feet annually from the Delta. ***The Delta Vision Task Force found that the face value of Delta watershed water permits is 8.4 times the average annual flows, resulting in an inability of the water projects to satisfy their contracts. Even within the constraints of available water supplies,*** the projects ~~generally~~ are not able to deliver their full contract amounts because the projects are also operated for Delta water quality requirements and fish protections. ***In drought years, deliveries are reduced even further. In recent years,*** on average, the projects together have exported about 5 million acre-feet annually.

Source: www.abag.ca.gov/abag/events/ga/Arne%20Simonsen.ppt

Delta Vision Blue Ribbon Task Force PowerPoint "Governor's Delta Vision Process," October 23, 2008, Slide 20

32

Topic: Project Operations

Page & line number: D-22, 38

Comment, suggested text:

Figure D-8 shows the locations of SWP and ***CVP*** facilities.

33

Topic: Project Operations

Page & line number: D-23

Comment, suggested text:

Line 26: Explain the reference to Old & Middle River (OMR)

34

Line 37: export/***import*** ratio?

35

Line 38: Meeting the standards was accomplished – Was it? (D-1641 standards were certainly violated this year.) Would it be more accurate to say this?

Changes in the water rights of the CVP, SWP, and others were instituted with the goal of meeting the new standards.

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36	<p>Topic: Surface Water Quality Page & line number: D-24, 34 Comment, suggested text: Add this:</p> <p><i>(Electrical conductivity is an indicator of the amount of salt in the water.)</i></p>
37	<p>Topic: Surface Water Quality Page & line number: D-25, 10-12 Comment, suggested text: Meaning unclear:</p> <p><i>Manufacture and commercial distribution of materials containing detectable PCBs have been banned, but large quantities of PCBs remain in use. ???</i></p>
38	<p>Line 27: oxygen-demanding (easier to read if this word is hyphenated)</p>
39	<p>Topic: Surface Water Quality Page & line number: D-26, 3 Comment, suggested text: Instead of “anthropogenic”, how about “human”? Or just say “by activities such as”.</p>
40	<p>Topic: Drinking Water Quality Page & line number: D-27, 19 Comment, suggested text:</p> <p>The Delta provides <i>some portion of</i> drinking water to more than 25 million people. . . .</p>
41	<p>Topic: Drinking Water Quality Page & line number: D-27 Comment, suggested text: I’m confused by this section.</p> <p>We’re used to discussions of water quality for export, which is what the first paragraph deals with. But the second paragraph deals with water quality for people in the Delta itself. Please specify “in the <i>Delta</i> region.”</p>
42	<p>There should be some kind of transition between the first and second paragraphs to show that export water quality is a separate issue from the quality of drinking water for people in the Delta who rely on contaminated groundwater wells.</p>

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43	<p>Topic: Groundwater Quality Page & line number: D-28, 14 Comment, suggested text: Chromium is used in metal alloys . . . ?</p>
44	<p>Topic: Other Flood Related Laws and Plans Page & line number: D-30, 13 Comment, suggested text: on page <u>????</u></p>
45	<p>Topic: Historic Floods Page & line number: D-30, 38 Comment, suggested text: This is a misrepresentation of the frequency of flooding in the Delta. Please see comments above for Flood Risk, page D-14 above and use my suggested changes there.</p>
46	<p>Topic: Historic Floods Page & line number: D-30, 1 Comment, suggested text: The sentence beginning with “For example” is not an example of floods during winter storms. Please see comments above for Flood Risk, page D-14 above.</p>
47	<p>Line 6: <i>Delta levee failures caused 165 inundations of islands and tracts after 1900 (URS 2008), but the frequency of levee failures has decreased in recent decades with improvements in levee engineering and maintenance.</i></p>
48	<p>Line 13: Floods have been recorded in the Central Valley</p>
49	<p>Topic: Bay Delta Conservation Plan Page & line number: D-35 Comment, suggested text:</p>
50	<p>Line 3: Department of Fish and Wildlife</p>
51	<p>Line 7: “conservation measures intended to protect, restore, etc.” It is at this point speculative that the conservation measures will actually have the intended effect.</p>
51	<p>Line 17: semicolon after Delta (“Delta; however, the preferred”) But the fact is that Given the uncertainty of the situation at this point, it might bet</p>

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52	<p>Topic: Bay Delta Conservation Plan</p> <p>Page & line number: D-35, 17-25</p> <p>Comment, suggested text: The BDCP process is not at this time seriously considering a range of options for conveying water. It would probably be best to omit this paragraph and associated bullet points. The point about modifying Delta conveyance facilities has been made in the preceding paragraph.</p>
53	<p>Topic: Bay Delta Conservation Plan</p> <p>Page & line number: D-35, 26-29 ff</p> <p>Comment, suggested text: This list of impacts is very abbreviated.</p> <p>. . . there are impacts to the Delta community from the BDCP. <i>BDCP documents identify 750 impacts to the Delta, including 48 that are identified as significant, adverse, and unavoidable. Among them,</i> the Administrative raft EIR/EIS of the BDCP identified. . .</p>
54	<p>Line 30: Lower case “farmland”</p>
55	<p>Line 41 ff: Maybe you should just refer readers to the BDCP website. We’ve already passed the date on Line 1 on the next page.</p>
56	<p>Topic: Triennial Review</p> <p>Page & line number: D-36, 25</p> <p>Comment, suggested text: designates</p>
57	<p>Topic: Ecosystem Restoration Program</p> <p>Page & line number: D-37, 19</p> <p>Comment, suggested text: What does “Stage 2” refer to?</p>
58	<p>Topic: Central Valley Flood Protection Plan</p> <p>Page & line number: D-38, 21-22</p> <p>Comment, suggested text:</p> <p>Add after line 22: <i>Portions of the Central Delta do not lie in either the Sacramento or San Joaquin River basins and are not part of the State’s FloodSafe Regional Flood Management Plan.</i></p> <p>Source: http://www.water.ca.gov/cvfmp/regionalplan/ see map at right</p>

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Topic: Integrated Regional Water Management Plans

Page & line number: D-39

Comment, suggested text:

59 Line 14: principles (not principals)

60 Line 15: IRWM (not IWM?)

Topic: Table D-6

Page & line number:

61 Comment, suggested text: Why include this when all dates are past?

Topic: Figure D-1, Regional Inflows and Outflows

Page & line number:

62 Comment, suggested text: Include outflows to Bay (or rename the Figure).

Topic: Figure D-8, Location of Water Project Facilities

Page & line number:

63 Comment, suggested text: **Delta Cross Channel** should be in bolder type; it is a CVP facility

Other: